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6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

8 LKIMMY, INC., a Nevada corporation,
9 Plaintiff,

10 vs.

11 BANK OF AMERICA, N.A., a national banking
12 association; IL KIM aka JULIUS KIM, an
individual; DOES I through X; and ROE
13 BUSINESS ENTITIES I through X; inclusive,
14 Defendants.

Case No.: 2:20-cv-02184-RFB-VCF

**STIPULATION AND [PROPOSED]
ORDER TO MODIFY THE BRIEFING
SCHEDULE FOR DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT
(First Request)**

15 Plaintiff, LKimmy, Inc. ("LKimmy"), and Defendant, Bank of America, N.A. ("BANA"),
16 by and through their respective counsel of record, hereby stipulate and agree to modify the briefing
17 schedule for BANA's motion for summary judgment [ECF No. 46] filed on September 10, 2021.
18 Specifically, the parties agree that the deadline for Plaintiff to respond to BANA's motion for
19 summary judgment shall be extended from its current deadline of September 24, 2021 to
20 September 29, 2021; and further agree that the deadline for BANA to file its reply in support of its
21 motion for summary judgment shall be extended from the current deadline of October 8, 2021 to
22 October 15, 2021.

23 The parties respectfully submit the foregoing requested modifications are supported by
24 good cause, as the Court has scheduled a hearing on LKimmy's motion to remand [ECF No. 4] for
25 September 24, 2021 [ECF No. 48] which, if granted, would render the parties' competing motions
26 for summary judgment moot.

27 ...

28 ...

1 This stipulation is submitted in compliance with LR IA 6-1. The parties agree that the
2 foregoing proposed extensions are not being requested in bad faith or to delay these proceedings
3 unnecessarily. This is the first stipulation to modify the briefing schedule for BANA's motion for
4 summary judgment [ECF No. 46].

5 DATED this 22nd day of September, 2021.

6
7 HONG & HONG LAW OFFICE

8 /s/ Joseph Y. Hong

9 JOSEPH Y. HONG, ESQ.

10 State Bar No. 005995

11 1980 Festival Plaza Drive, Suite 650

12 Las Vegas, Nevada 89135

13 Attorney for Plaintiff

14 *LKimmy, Inc.*

15 DATED this 22nd day of September, 2021.

16
17 WILSON, ELSER, MOSKOWITZ,
18 EDELMAN & DICKER, LLP

19 /s/ Chad C. Butterfield

20 CHAD C. BUTTERFIELD, ESQ.

21 State Bar No. 010532

22 6689 Las Vegas Blvd. South, Suite 200

23 Las Vegas, Nevada 89119

24 Attorney for Defendant

25 *Bank of America, N.A.*

26 **ORDER**

27 **GOOD CAUSE SHOWN, IT IS SO ORDERED.**

28 Dated this 23rd day of September, 2021.



RICHARD F. BOULWARE, II

UNITED STATES DISTRICT JUDGE